

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

EHSAN JAMSHIDI,

Defendant.

**UNDER SEAL**

Case No. 1:22-MJ-303

**AFFIDAVIT IN SUPPORT OF  
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Christopher P. Haas, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives ("ATF"), being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint and arrest warrant charging Ehsan Jamshidi (hereafter "JAMSHIDI") with possession of an unregistered machinegun in violation of Title 18, United States Code, Section 922(o), within the Eastern District of Virginia.

2. I am a Special Agent with the ATF and have been so employed since 2015. I am currently assigned to the ATF Falls Church II Field Office, an enforcement group responsible for investigating violent crime, gangs, armed drug trafficking, and other firearm related violations. In my capacity as a law enforcement officer, I have investigated individuals for the illegal possession and use of firearms.

3. This affidavit does not contain every fact known to me regarding this investigation, but rather contains information necessary to demonstrate probable cause in support of the above-referenced criminal complaint and arrest warrant. I have participated in the investigation of the offenses set forth below. The facts and information contained in this affidavit are based on my personal knowledge and information obtained from other law enforcement officers. All observations referenced in this affidavit that were not personally made by me were relayed to me by the persons who made such observations or in reports that detailed the events described by those persons.

#### **PROBABLE CAUSE**

4. On May 14, 2021, ATF received an anonymous tip through ATF's mobile app tip line, which allows users to confidentially submit tips about crimes, regarding the sale of an AR-9 automatic rifle through Facebook. The tip named the seller of the AR-9 and showed a screenshot of a Facebook Messenger conversation between the seller who was attempting to sell the AR-9 machinegun and another individual.

5. On June 22, 2021, ATF special agents interviewed the Seller (hereafter referred to as "the Cooperating Source") in an ATF vehicle at a Target store parking lot in Fredericksburg, VA regarding the machinegun transfer. Before the interview, the Cooperating Source was advised of the Cooperating Source's *Miranda* rights. The Cooperating Source stated that the Cooperating Source understood these rights. The interview was video recorded. ATF special agents advised that the Cooperating Source was not under arrest and could leave the interview anytime. The ATF special agents asked the Cooperating Source about the Facebook Messenger chat described above, regarding the sale of an AR style machinegun. After initially denying involvement, the Cooperating Source acknowledged participating in the Facebook Messenger

conversation and stated that the firearm was a machinegun. The Cooperating Source described selling the machinegun to K.A. who lives in Maryland for one thousand dollars. The Cooperating Source stated that K.A. came to Fredericksburg, VA, which is in the Eastern District of Virginia, to pick up the machine gun from the Cooperating Source. The Cooperating Source described purchasing the lower receiver of the AR-9 rifle from GFR, LLC, a firearms store located in Fredericksburg, VA.

6. The Cooperating Source stated that an active-duty member of the U.S. Marine Corps, M.R., modified the AR-9 rifle into a machinegun that was sold to K.A. The Cooperating Source stated that M.R. has been modifying AR-style rifles into machineguns for approximately a year and a half. The Cooperating Source stated that M.R. has a mill and a press to convert the rifles into machineguns. The Cooperating Source stated that M.R. lives in Fredericksburg, VA. The Cooperating Source described originally meeting M.R. through Armslist.com, a website where individuals can buy, sell, and trade firearms through private sales. The Cooperating Source stated that M.R. charged three hundred dollars to convert the lower receiver to a fully automatic rifle. The Cooperating Source stated that M.R. converted lower receivers without serial numbers, or “ghost lowers,” which M.R. bought online, into machineguns. M.R. had sent the Cooperating Source videos of M.R. shooting the converted rifles and that the firearms function as machineguns.

7. On June 24, 2021, ATF conducted a search of the National Firearms Registration and Transfer Record (“NFRTR”), the central registry for all items regulated under the National Firearms Act (“NFA”), which includes machineguns, to verify if the Cooperating Source, K.A., or M.R. had any tax stamps certifying any machinegun ownership or licenses. The search of the registry came back negative for all three and no machineguns were registered to them.

8. On October 1, 2021, ATF special agents conducted a controlled purchase of a firearm from M.R. The operation was audio and video recorded. During the operation, an ATF special agent acting in an undercover capacity purchased a custom-made Aero Precision model X15 semi-automatic rifle bearing serial number X249327 from M.R. for \$1,900.00. During the transaction, M.R. told the agent that he had manufactured machineguns in the past and had “no problem doing them.”

9. Through the recorded in-person conversation at the controlled purchase and preserved SMS/MMS messages conducted via cell phone that continued from October 1, 2021, through October 13, 2021, M.R. agreed to manufacture an un-serialized machinegun and sell the un-serialized machinegun to the undercover agent.

10. On October 4, 2021, M.R. exchanged SMS/MMS messages with the undercover agent. At approximately 1405 hrs., M.R. sent an SMS message that stated, “Parts are ordered. Went shooting yesterday with a buddy I built a full for. It shot sooooo smooth.” Based on my training and experience, I know that individuals who make and possess fully automatic machineguns some time refer to them as a “full.” M.R. then sent the undercover agent an MMS message containing a video. The video depicted a male subject, who was not M.R., wearing a black shirt and tan pants and firing a machinegun. ATF subsequently confirmed that this male subject was JAMSHIDI.

11. On October 13, 2021, ATF special agents conducted a controlled purchase of a machinegun from M.R. for \$1,600.00. The transaction was audio and video recorded. During the transaction, M.R. explained the operation of the machinegun and stated that, “It’s full auto.” M.R. stated that he had built “a few” machineguns for others. M.R. stated that he built two



others at the same time that he built the machinegun for the undercover agent and that he had two other “builds” to complete for other people.

12. Following the undercover controlled purchase, the firearm was function checked by ATF special agents. The firearm function checked as a machinegun. On October 27, 2021, the ATF Firearms Technology Criminal Branch composed a report of technical examination which stated that firearm tested as a machinegun.

13. On January 14, 2022, ATF, Naval Criminal Investigative Service (“NCIS”), and United States Postal Inspection Service (“USPI”) special agents and inspectors conducted a controlled purchase of two M16-type machineguns bearing no manufacturer’s marks or serial number from M.R. for \$2,700.00. One of the machine guns was a 5.56 caliber and the other was a .300 Blackout caliber. The transaction was audio and video recorded. During the transaction, M.R. provided the undercover agent with two firearms bearing no manufacturer’s marks and no serial number. M.R. stated, “they’re all full autos, they’ve got the sears in them.” Based on my training and experience, I know that “full auto” is a common term to describe a machinegun and “sears” is a commonly used term to refer to “auto sears,” one of the parts of the M16 type trigger group that enable fully automatic firing.

14. Following the undercover controlled purchase, the firearms were function checked by ATF special agents. The firearms function checked as machineguns. On January 26, 2022, the ATF Firearms Technology Criminal Branch composed a report of technical examination which stated that firearms tested as machineguns.

15. On January 26, 2022, an arrest warrant for M.R. and search warrants for M.R.’s apartment, storage unit, and vehicles were signed by the Honorable United States Magistrate Judge Theresa C. Buchanan.

16. On January 28, 2022, ATF, NCIS, and USPI special agents arrested M.R. at his residence and executed search warrants of the apartment, phones, storage unit, and vehicles. During the search, the agents recovered evidence of firearms manufacturing, including a drill press and several unfinished AR15 type lower receivers.

17. Also on January 28, 2022, ATF agents interviewed M.R. The interview was video recorded and preserved as evidence. After being advised of his constitutional rights, M.R. admitted to the agents that he manufactured machineguns. M.R. stated that he sold one of the machineguns to Ehsan JAMSHIDI, an active duty Marine with whom M.R. worked, who “has it at his place.” When asked about the video M.R. sent to the undercover agent that depicted a male subject shooting a machinegun, M.R. stated that the person in the video was JAMSHIDI. NCIS agents identified JAMSHIDI as a Marine Staff Sergeant assigned to the same organization as M.R. and provided the phone number NCIS has on record for JAMSHIDI. When asked if all of the people to whom M.R. sold firearms were in his phone contacts, M.R. stated that they were all in his contacts, with the exception of the undercover ATF agent. The phone number NCIS has on record for JAMSHIDI was saved in M.R.’s phone with the name “Jam.”

18. During a proffer on April 5, 2022, M.R. reaffirmed that he built a machinegun for JAMSHIDI and sold it to him for \$1800. M.R. stated that he transferred the machinegun to JAMSHIDI in the parking lot of the building where they both worked on Quantico Marine Corps Base, which is in the Eastern District of Virginia. M.R. stated that he parked next to JAMSHIDI’s red Honda, that JAMSHIDI wrapped the machinegun in something that JAMSHIDI had in the trunk of his car, and placed the machinegun into the trunk of his red Honda sedan.

19. A search of the National Law Enforcement Telecommunication System (“NLETS”) revealed that a red Honda Civic bearing VIN 2HGFC2F55HH517349 and Virginia license plate UJE8435 is registered to Ehsan JAMSHIDI. The red Honda Civic bearing Virginia license plate was later observed by agents in the parking garage of JAMSHIDI’s residence and at JAMSHIDI’s place of employment, the Marine Corps Information Operations Center, Quantico Marine Corps Base.

20. On February 2, 2022, ATF agents contacted JAMSHIDI at his residence in Lorton, VA, in an attempt to recover the machinegun M.R. said he had sold to JAMISHIDI. Prior to contacting JAMSHIDI, the agents observed a red Honda bearing Virginia license plate UJE8435 parked in a space in the apartment complex garage. The agents knocked on the door of JAMISHIDI’s apartment and a male wearing a U.S. Marine Corps uniform answered the door. The agents identified him as JAMSHIDI from his driver’s license photograph and by his affirmation that he was JAMSHIDI. The agents advised JAMSHIDI of his constitutional rights per *Miranda*, although JAMSHIDI was not in custody. JAMSHIDI confirmed that he knows M.R. The agents informed JAMSHIDI that M.R. had been arrested for manufacturing machineguns, that the agents believed JAMSHIDI was in possession of one of the machineguns, and that the agents intended to recover the machinegun. JAMSHIDI invoked his right to counsel by stating that he wanted an attorney.

21. The ATF agents served JAMSHIDI with an ATF warning letter and left. The warning letter stated, among other things, that: “This letter serves to officially notify you that you are prohibited, pursuant to 26 U.S.C. § 5861(d), from possessing . . . machine guns . . . without first registering the firearm in the National Firearms Registration and Transfer Record. Furthermore this letter serves to officially warn you to cease and desist from receiving,

possessing or transporting any such firearm without first registering said firearm with ATF in the National Firearms Registration and Transfer Record. Continued and/or future violations of 26 U.S.C. § 5861(d) could result in a recommendation for criminal prosecution.” The ATF agents left their government issued cell phone numbers with the warning notice for JAMISHIDI. One of the ATF agents also left his business card with his phone number. JAMSHIDI did not contact the ATF agents directly or through a legal representative.

22. On February 4, 2022, ATF agents began reviewing information recovered from M.R.’s cell phone pursuant to a federal search warrant signed by Honorable United States Magistrate Judge Theresa C. Buchanan dated January 26, 2022. While reviewing the data, agents observed that the phone number NCIS has on record for JAMSHIDI was saved in M.R.’s contacts with the name, “Jam.” Agents observed an ongoing SMS conversation between Rodriguez and “Jam.” The conversation included a discussion revolving around “Jam” purchasing a firearm from Rodriguez. On or about January 10, 2021, “Jam” sent messages to M.R. stating, “You still selling the AR?” followed by, “Let me see it tomorrow.”<sup>1</sup> M.R. responded to the messages, “All my rifles sold already. I’ll be building more soon. Yes, I’ll be in tomorrow.” Subsequently, “Jam” sent M.R. a text message asking, “Can you make automatic ones too?” M.R. responded, “Yup, all sold. You kept putting me off. I can possibly make automatic ones.” “Jam” then sent M.R. a text message asking, “Can you make me an automatic

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<sup>1</sup> All text messages extracted and included in this affidavit were date and time stamped in Coordinated Universal Time (UTC+0). The actual dates and times in the Eastern District of Virginia that these messages were sent are, therefore, five hours earlier than the date/time stamp on the message (UTC-5), *i.e.* a message date/time stamped 1/11/2021 3:09:52 AM(UTC+0) would have occurred at 1/10/2021 10:09:52 PM(UTC-5).



one, please.” Rodriguez responded, “I can build it.” “Jam” then sent the messages, “I’ll buy it” and “Just let me know once it’s ready and I’ll pay up.”

From: +17033004300 Jam  
You still selling the AR?  
Status: Read  
1/11/2021 3:09:52 AM(UTC+0)

From: +17033004300 Jam  
Let me see it tomorrow  
Status: Read  
1/11/2021 3:10:02 AM(UTC+0)

From: +17033004300 Jam  
You coming to work?  
Status: Read  
1/11/2021 3:10:07 AM(UTC+0)

To: +17033004300 Jam  
All my rifles sold already. I'll be building more soon. Yes, I'll be in tomorrow

Participant	Delivered	Read	Played
+17033004300 Jam			

Status: Sent  
1/11/2021 3:11:00 AM(UTC+0)

From: +17033004300 Jam  
What you mean sold out?  
Status: Read  
1/11/2021 3:26:08 AM(UTC+0)

From: +17033004300 Jam  
You said you had one for me  
Status: Read  
1/11/2021 3:26:19 AM(UTC+0)

From: +17033004300 Jam  
I have the money and everything  
Status: Read  
1/11/2021 3:26:24 AM(UTC+0)



From: +[REDACTED] 4399 Jam  
Bro are you serious? Lol  
Status: Read

1/11/2021 3:26:35 AM(UTC+0)

From: +[REDACTED] 4399 Jam  
Can you make automatic ones too?  
Status: Read

1/11/2021 3:26:47 AM(UTC+0)

To: +[REDACTED] 4399 Jam  
Yup, all sold. You kept putting me off. I can possibly make automatic ones

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

1/11/2021 3:27:35 AM(UTC+0)

From: +[REDACTED] 4399 Jam  
Putting you off?  
Status: Read

1/11/2021 3:27:49 AM(UTC+0)

From: +[REDACTED] 4399 Jam  
I had the money in cash for weeks now  
Status: Read

1/11/2021 3:27:59 AM(UTC+0)

From: +[REDACTED] 4399 Jam  
Can you make me an automatic one, please.  
Status: Read

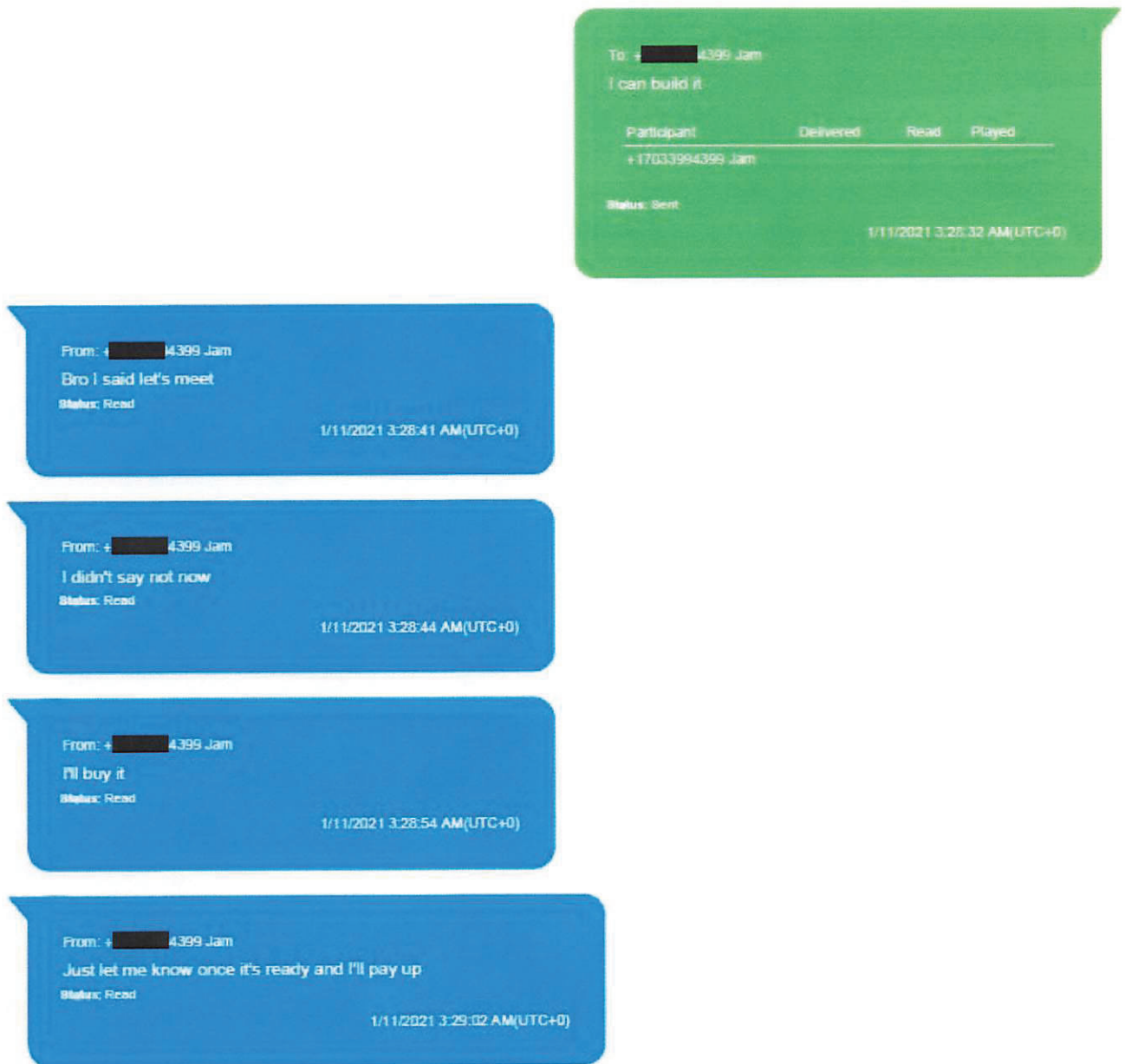
1/11/2021 3:28:14 AM(UTC+0)

To: +[REDACTED] 4399 Jam  
I brought the rifle. I told you I had it, and you kept telling me not now, not now

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

1/11/2021 3:28:25 AM(UTC+0)



23. On or about March 12, 2021, “Jam” sent a text message to M.R. asking, “Hey Rod, when will the rifle be ready again?” M.R. responded, “As soon as the full auto stuff gets here.”

From: +[REDACTED] 4399 Jam  
Hey Rod, when will the rifle be ready again?  
Status: Read  
3/13/2021 2:07:02 AM(UTC+0)

To: +[REDACTED] 4399 Jam  
As soon as the full auto stuff gets here

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent  
3/13/2021 2:07:47 AM(UTC+0)

From: +[REDACTED] 4399 Jam  
Okay bring the money next week then  
Status: Read  
3/13/2021 2:08:09 AM(UTC+0)

To: +[REDACTED] 4399 Jam  
Word...\$1800

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent  
3/13/2021 2:08:44 AM(UTC+0)

24. On or about March 31, 2021, “Jam” sent a text message to M.R. asking, “Hey bro, any updates on the parts?” M.R. replied, “Tracking number says the part will be here Friday”.

From: +17033994399 Jam  
Hey bro, any updates on the parts?  
Status: Read  
3/31/2021 11:26:54 PM(UTC+0)

To: +17033994399 Jam  
Tracking number says the part will be here Friday  

Participant	Delivered	Read	Played
+17033994399 Jam			

  
Status: Sent  
3/31/2021 11:27:36 PM(UTC+0)

To: +17033994399 Jam  
<https://www.deltateamtactical.com/shiptracking.asp?trackno=9400116901675356394881>  

Participant	Delivered	Read	Played
+17033994399 Jam			

  
Status: Sent  
3/31/2021 11:30:07 PM(UTC+0)

To: +17033994399 Jam  
9400116901675356394881  

Participant	Delivered	Read	Played
+17033994399 Jam			

  
Status: Sent  
3/31/2021 11:30:30 PM(UTC+0)

25. On Friday, April 2, 2021, M.R. sent "Jam" a message saying, "It's here," along with a photo of firearms parts. The firearms parts depicted include a M-16 style full-auto hammer and auto-sear, and a jig used to drill a hole for the auto-sear retaining pin. Your affiant added the callout boxes to the photo below.





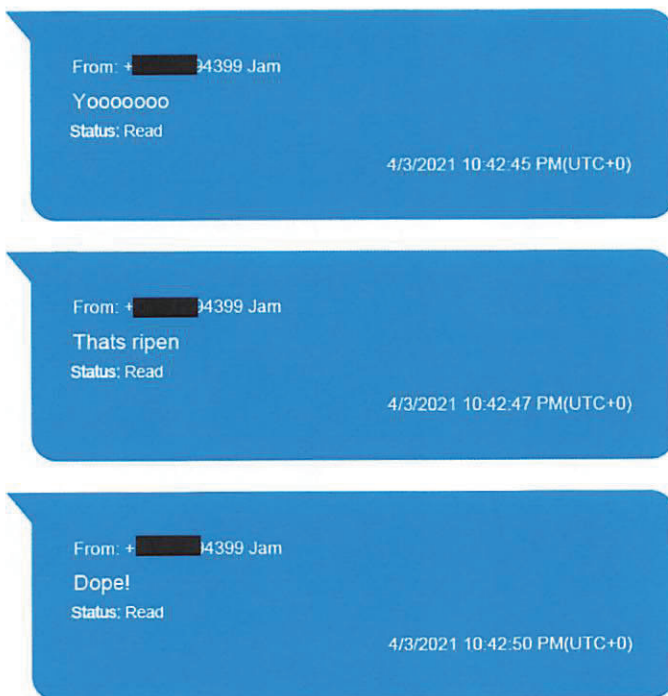
26. On or about April 3, 2021, M.R. sent “Jam” a video depicting an M-16 type firearm lower receiver group with fire control parts installed. In the video, M.R. demonstrates that the selector switch rotates to all three positions. In the video, M.R. refers to the positions as, “safe, fire, danger mode.” In the video, the top half of the auto-sear and the auto-sear retaining



pin can be observed installed in the firearm. Your affiant added the callout boxes in the still capture below.



27. Also on or about April 3, 2021, “Jam” replied to the video mentioned above with three sequential messages, “Yoooooooo,” “Thats ripen,” and “Dope!”



28. On or about April 4, “Jam” sent a message asking, “can you send me a picture of the whole rifle?”

29. On or about April 4 and 5, 2021, “Jam” and M.R. further discussed the price of the machinegun via text messages. “Jam” attempted to negotiate the price down from \$1800, but M.R. declined. The conversation continued on or about April 14, 2021, when “Jam” and M.R. discussed the payments made so far. M.R. stated that “Jam” had given him two payments of “\$700” and “\$500,” respectively, and “Jam” still owed him “\$600.” “Jam” asked M.R. for his Cash App account name and then stated that he had completed payment through Cash App, a mobile payment service, to M.R.’s account, he had “[p]aid in full,” and the two agreed to exchange possession of the firearm at work.

To: [REDACTED] 4399 Jam  
\$1800

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/5/2021 1:07:39 AM(UTC+0)

From: [REDACTED] 4399 Jam  
Can you do 177  
Status: Read

4/5/2021 1:07:57 AM(UTC+0)

To: [REDACTED] 4399 Jam  
I already hooked you up from 2k

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/5/2021 1:08:09 AM(UTC+0)

From: [REDACTED] 4399 Jam  
Okay, I'll bring the cash tomorrow  
Status: Read

4/5/2021 1:08:27 AM(UTC+0)

To: [REDACTED] 4399 Jam  
Ok

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/5/2021 1:08:39 AM(UTC+0)

From: [REDACTED] 4399 Jam  
Hey bro, my bad, I left to go work out and telework. Let's get together tomorrow after work.  
I'll get the money tomorrow too  
Status: Read

4/5/2021 5:32:26 PM(UTC+0)

To: [REDACTED] 4399 Jam  
Word

Participant	Delivered	Read	Played
+17033894399 Jam			

Status: Sent

4/5/2021 9:35:45 PM(UTC+0)

To: [REDACTED] 4399 Jam  
Don't forget to bring the bread

Participant	Delivered	Read	Played
+17033894399 Jam			

Status: Sent

4/13/2021 1:21:10 AM(UTC+0)

From: [REDACTED] 4399 Jam  
Okay bro, got you.  
Status: Read

4/13/2021 1:24:25 AM(UTC+0)

From: [REDACTED] 4399 Jam  
Hey bro  
Status: Read

4/14/2021 8:39:04 PM(UTC+0)

To: [REDACTED] 4399 Jam  
Yo

Participant	Delivered	Read	Played
+17033894399 Jam			

Status: Sent

4/14/2021 8:39:16 PM(UTC+0)

From: [REDACTED] 4399 Jam  
I actually paid you 740  
Status: Read

4/14/2021 8:39:19 PM(UTC+0)



From: [REDACTED] 4399 Jam  
Plus the 500 today  
Status: Read

4/14/2021 8:39:31 PM(UTC+0)

To: [REDACTED] 4399 Jam

No, I wrote it down in front of whoever was there.  $700 + 500$

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/14/2021 8:40:26 PM(UTC+0)

To: [REDACTED] 4399 Jam

I still have it in an envelope at my place.

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/14/2021 8:40:44 PM(UTC+0)

From: [REDACTED] 4399 Jam  
You need 500 more dollars?  
Status: Read

4/14/2021 8:41:05 PM(UTC+0)

To: [REDACTED] 4399 Jam

\$600

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/14/2021 8:41:33 PM(UTC+0)

From: [REDACTED] 4399 Jam  
Okay what's your cash app?  
Status: Read

4/14/2021 8:41:42 PM(UTC+0)



To: [REDACTED] 4399 Jam  
\$throwbackthrifter

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/14/2021 8:42:21 PM(UTC+0)

From: [REDACTED] 4399 Jam  
Sent: Paid in full.  
Status: Read

4/14/2021 8:43:25 PM(UTC+0)

To: [REDACTED] 4399 Jam  
I got you bro...want me to bring it? Or do you want to come over and get it later?

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/14/2021 8:44:16 PM(UTC+0)

From: [REDACTED] 4399 Jam  
I'll come over and get it.  
Status: Read

4/14/2021 8:44:32 PM(UTC+0)

From: [REDACTED] 4399 Jam  
Actually, will you be at work tomorrow?  
If so, can you bring it tomorrow?  
Status: Read

4/14/2021 8:44:52 PM(UTC+0)

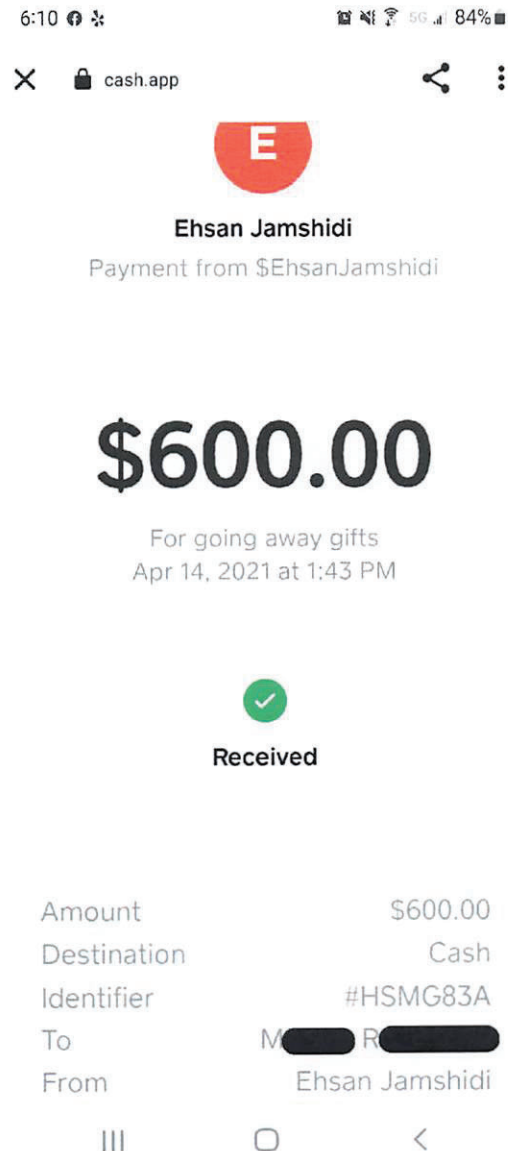
To: [REDACTED] 4399 Jam  
I will

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent

4/14/2021 8:45:00 PM(UTC+0)

30. During a proffer on April 5, 2022, M.R. confirmed that JAMSHIDI made the first two payments in cash for \$700 and \$500 and that JAMSHIDI made his final payment of \$600 for the machinegun via Cash App. M.R. provided a receipt from his Cash App account for \$600 from Eshan JAMSHIDI corresponding to the text conversation referenced above.



31. On February 8, 2022, while continuing to review the data recovered from M.R.'s phone, ATF agents discovered the video used to create the edited video sent via MMS message

to the undercover agent on October 4, 2021. The agents recognized the male subject firing the machinegun as JAMSHIDI from their contact with JAMSHIDI on February 2, 2022. Of note in the screenshots of the video below, the machinegun is missing front and rear sights, consistent with the text exchange between “Jam” and M.R. on April 14, 2021.





From: +[REDACTED] 4399 Jam  
Do you have any sights laying around?  
Status: Read  
4/14/2021 8:45:34 PM(UTC+0)

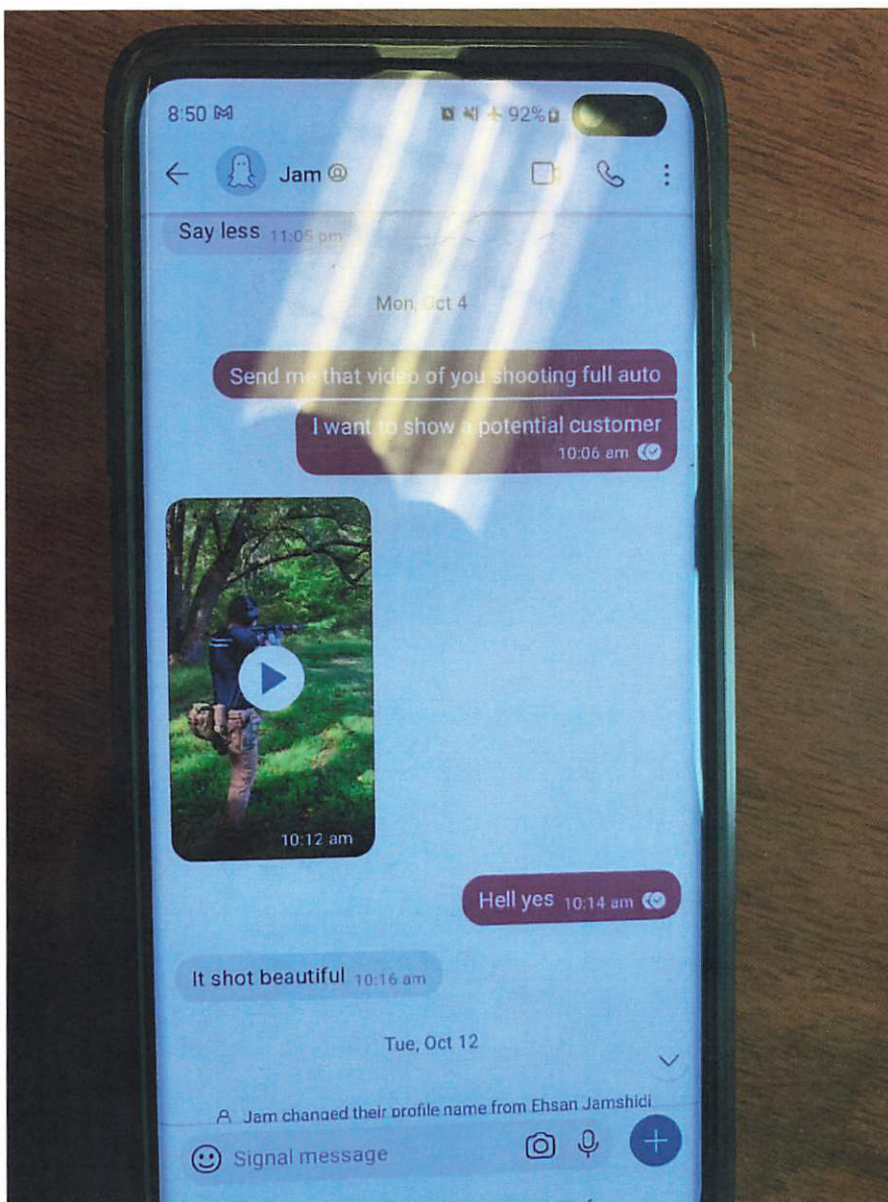
To: +[REDACTED] 4399 Jam  
I do not, but I can hit up a buddy right now to see if he has one

Participant	Delivered	Read	Played
+17033994399 Jam			

Status: Sent  
4/14/2021 8:48:12 PM(UTC+0)

32. During the proffer on April 5, 2022, M.R. reviewed the video and confirmed that the person in the video referenced above is JAMSHIDI and that JAMSHIDI was shooting the machinegun that M.R. built and sold to him. M.R. stated that the video was taken at a farm near Spotsylvania, VA during a farewell party for their supervisor. (Your affiant, before the proffer, had observed text messages on M.R.'s phone that indicated that the farewell party occurred on October 3, 2021.) M.R. opened the Signal App on his cell phone and showed agents a conversation that took place using the Signal App between "Jam" and M.R. on October 3 and 4, 2021. During the conversation, M.R. asked, "send me that video of you shooting full auto," and "I want to show a potential customer," then "Jam" sent the above referenced video to M.R. as

well as a message stating, “It shot beautiful.”



33. On February 8, 2022, ATF completed a search of the National Firearms Registration and Transfer Record (“NFRTR”), the central registry for all items regulated under the National Firearms Act (“NFA”), which includes machineguns, to verify if JAMSHIDI had any tax stamps certifying any machinegun ownership or licenses. The search determined that JAMSHIDI has one silencer registered to him and no registered machineguns. On August 24,



2022, ATF completed a second search of the NFRTR. The second search returned the same result, that JAMSHIDI has one silencer registered to him and no registered machineguns.

34. On October 19, 2022, ATF agents interviewed J.N. J.N. stated that JAMSHIDI had approached him at work on Marine Corps Base Quantico to speak with him. JAMSHIDI told J.N. that ATF had arrested M.R. and had come to JAMSHIDI's residence over a gun that JAMSHIDI bought from M.R. J.N. did not ask JAMSHIDI what kind of gun JAMSHIDI had bought from M.R. J.N. said he was scared to ask JAMSHIDI. JAMSHIDI told J.N. to talk to a lawyer, he has rights, and to be careful.

### CONCLUSION

35. Based on the foregoing, I submit there is probable cause to conclude that from on or about April 14, 2021, through on or about October 4, 2021, within the Eastern District of Virginia, EHSAN JAMSHIDI did unlawfully and knowingly possess a machinegun, that is, an M16-type, 5.56mm NATO caliber machinegun, this firearm not being registered in the National Firearms Registration and Transfer Record, in violation of Title 18, United States Code, Section 922(o).

Respectfully submitted,



Digitally signed by  
CHRISTOPHER HAAS  
Date: 2022.11.03 14:42:04  
-04'00'

Christopher P. Haas, Special Agent  
Bureau of Alcohol, Tobacco, Firearms &  
Explosives

Subscribed and sworn to by telephone  
in accordance with Fed. R. Crim. P. 4.1  
this 4<sup>th</sup> day of November 2022.

  
HON. WILLIAM E. FITZPATRICK  
UNITED STATES MAGISTRATE JUDGE